

### **REMARKS**

Applicant has carefully considered the rejections of the Examiner in the present application. In light of this consideration, Applicants believe that the claims, as amended, are allowable. Applicants respectfully request reconsideration of the rejection of the claims now pending in the application.

An attempt was made to contact the Examiner on September 13, 2007 by telephone. However, a voice message was received that the listed number was an unassigned PTO number. A follow-up call was then placed to Examiner's Supervisor, Gilberto Barron, who indicated that the Examiner Thomas Ho had departed. A review of the office action indicated a phone conference was strongly needed but according to Supervisor Gilberto Barron, not *realistically* available. The Applicants thus, have never-the-less endeavored to be as responsive as possible to the present office action, but would request that due consideration be provided in the subsequent office action for this situation. Indeed the Applicants are concerned that the present Application has been inadvertently assigned to the wrong Art Unit!

In this the first office action, claims 1-19 have been rejected under 35 U.S.C. §103(a) as being unpatentable over US Patent 6,212,635 to Reardon (hereinafter Reardon).

Claim 2 has been canceled. Claims 1, 3, and 17-19 have been amended.

Claims 1-19 have been rejected under 35 U.S.C. §103(a) as being unpatentable over US Patent 6,212,635 to Reardon. Reardon teaches an apparatus and process by which to disable a computer's access to all or a part of the computer's memory system or associated peripherals, so as to protect the computer from accidental or malicious damage of data files or programs that may result from the activity of computer users or computer viruses. This result is achieved by providing the authorized user with a token whereby the user can

configure the security gateway to completely or partially disable the peripheral device without disrupting the operation of the computer or other peripherals. The principal hardware component of one embodiment of the invention is the security gateway which in a typical configuration simply adds new security functions to the programmable controllers that are typically used for an I/O controller or hard drive controller, although this is not always necessary. The process can just as easily be incorporated into a local network controller, a communications controller, or a main processor board for a system.

*As such Reardon does not provide for one key updating another "master" key, as is taught by the Applicants. Particularly Reardon does not provide a generic key which upon installation, is written with a unique machine code thus rendering that key unavailable for usage in any other machine.* (Actually the source for some of the apparent confusion could be that Reardon creates a second key as a security feature. Whereas the Applicants provide a generic key which is then *made exclusive* to the machine in which it's installed by writing into it) This is not surprising since Reardon is directed to solving an entirely different problem than the problem to which the Applicants teaching is directed. Reardon is directed to controlling human access to computers. The Applicants' teachings are directed to allowing the upgrading of a machine configuration, in the field, by the user, simply with the purchase of a SOK (system operation key) for a single machine. To keep the price reasonably low for the user the key needs to be limited to a single machine. Otherwise it would be necessary to charge the user for all potential machines which could be upgraded from that key, instead of just for one.

The Applicants wish to point out the specification pages 6 & 7, and particularly point out the following excerpt from the Application on page 6, line 25, through page 7, line 2:

*"In one alternative embodiment, one SOK with a predetermined address would be designated as the master key SOK and track all machine configuration information. At the first install of any subsequent SOK*

*beyond the master key SOK, the machine will interrogate the newly installed SOK and write any incremental configuration information contained therein into the master key SOK. The new subsequent SOK is contemporaneously written with the machine serial number and may be left in place or removed from the machine as the configuration upgrade is now resident in the master key SOK. A customer can add options at a later time by receiving a SOK that would enable the desired additional feature or features, and installing it into the machine. The number of SOKs that can be installed is thereby no longer limited by the number of interface sockets provided on the machine."*

As Reardon does not teach all elements of the Applicants' claimed invention, namely:

"providing a subsequently installed software operation key ... further comprising a memory, with a programmable serial region and an option code;

...

reading the programmable serial region of the memory and if found blank, *initializing with a printing apparatus machine identification number*;

comparing the content of the programmable serial region if not blank with the printing apparatus machine identification number;

reading the memory and *installing the option code into the master key software operation key"*

thus a prima facie case for obviousness rejection has not been made out. Allowance of claims 1-19 is requested.

The undersigned Xerox Corporation attorney authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025.

It is respectfully submitted that the present set of claims, as amended, are patentably distinct over the cited references. In the event the Examiner considers personal contact advantageous to the disposition of this case, he is hereby requested to call the undersigned attorney at (585) 423-6918, Rochester, NY.

Respectfully submitted,

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